REMARKS

This paper is responsive to the Non-Final Office Action dated January 26, 2005. Claims 1-30 were examined. All claims were rejected.

Claim Rejections Under 35 U.S.C. §101

Claims 1-24 are rejected under *35 U.S.C. §101* for being directed to non-statutory subject matter. Applicant has amended claims 1 and 7, but has not amended claim 12. Applicant respectfully submits that claim 12 is directed to statutory subject matter under 35 U.S.C. §101. Claim 12 produces a concrete, tangible, and useful result (see MPEP 2106). Claim 12 recites "rendering a display presentation" and recites "recognizing interactive entry of an opening boundary token," neither of which simply manipulate abstract ideas.

Claims Rejections Under 35 U.S.C. §102

Claims 1-15, 19, and 21-30 are rejected under *35 U.S.C. §102(b)* as being anticipated by U.S. Patent No. 6,311,323 issued to Shulman et al. (hereinafter "Shulman"). Applicant respectfully traverses all of these rejections at least because 1) a line of code and Shulman's associated pop-up window are the same lexical context and not two lexical contexts, 2) Shulman's "member access separator" is not an opening boundary token according to a first lexical context, and 3) Shulman never discloses or suggests automatically inserting a closing boundary token.

No disclosure or suggestion of a first lexical context and a second lexical context

The Office refers to Figure 1 of Shulman and argues that a line of code is a first lexical context, and an assist-window is a second lexical context. However, the line of code and the assist window are within the same lexical context. The line of code in Figure 1 depicts an object and the assist-window provides various member names for the object, both within the same lexical context. Claims 5 and 11 enumerate some lexical contexts to aid in understanding the term. In rejecting the claims 5 and 11, the Office only focused on "source language lexical context." The claims 5 and 11 recite the first lexical and second lexical contexts as corresponding to one of "a source language lexical context and a textual comment lexical

context; a source language lexical context and a string literal lexical context; a source language lexical context and a character lexical context; and a first source language lexical context and a second source language lexical context." In Shulman, the line of code is in accordance with a source language lexical context and the assist window is in accordance with the source language lexical context. Hence, Shulman does not disclose or suggest a first lexical context and a second lexical context.

Furthermore, Shulman does not disclose or suggest first and second lexical contexts as recited in claims 1, 7, 12, 25, and 30. Shulman does not disclose or suggest a transition in behavior in accordance with a first lexical context to behavior in accordance with a second lexical context. The line of code and the information presented in the assist window are both in accordance with the same source language lexical context. Shulman does not disclose or suggest "display of edit buffer content past the cursor position maintains its pre-introduction association with a first lexical context...while subsequent entry at the cursor position is subject to a second lexical context" as recited in claim 7, "creating a second lexical context operative for subsequent interactive entry at the insertion point" as recited in claim 12, "a source code editor that invokes the second language context nested within the first language context based solely on recognition of a boundary token defined by the first language context and entered at the cursor position, while maintaining pre-existing language context past the cursor position" as recited in claim 25, or "the language-based editor program recognizes entry of a transitional opening token defined by a first language context and, in response thereto, associates text subsequently entered into the buffer at an insertion point thereof with a second language context, while maintaining a pre-existing association between the first language context and contents of the buffer past the insertion point" as recited in claim 30. In Shulman, the entry prior and subsequent to the entry at the cursor position is in accordance with the same lexical context. The object identified and the members listed are both in accordance with the same source language lexical context.

No disclosure or suggestion of an opening boundary token

Shulman discloses opening an assist window responsive to entry of a member access separator (a ".") (col. 9, lines 26 – 35). Applicant respectfully submits that this member access separator is not an opening boundary token in accordance with a first language context. As

already stated, the entries preceding and subsequent to the member access separator are in accordance with the same source language lexical context. Hence, the member access separator cannot be a boundary token. In addition, the member access separator may initially cause display of the assist window, but the contents of the assist window change in response to additional text entered subsequent to the member access separator (col. 5, lines 1 – 5 and lines 39 – 58). Applicant respectfully submits that characterizing the member access separator as an opening boundary token appears inconsistent with this functionality as disclosed in Shulman with respect to the member access separator at least because there is only one source language lexical context. In claim 1, behavior transitions from being in accordance with a first lexical context to being in accordance with a second lexical context based on recognition of an opening boundary token. Claim 7 recites "in response to introduction of a language-defined opening boundary token...such that display of edit buffer content past the cursor position maintains its pre-introduction association with a first lexical context and with linguistically-driven typography therefor, while subsequent entry at the cursor position is subject to a second lexical context." Claim 12 recites "in response to said recognition of said opening boundary token, creating a second lexical context operative." Claim 25 recites "a source code editor that invokes the second language context nested within the first language context based solely on recognition of a boundary token." Claim 30 recites "recognizes entry of a transitional opening token defined by a first language context and, in response thereto, associates text subsequently entered...with a second language context."

No disclosure or suggestion of automatically introducing a closing boundary token

Shulman does not disclose or suggest automatically inserting, in response to introduction of an opening boundary token, a corresponding closing boundary token as recited in claims 7 and 4. The Office refers to the existence of a delimiter in the Figures, however there is no disclosure or suggestion in Shulman of automatically introducing a closing delimiter. In Shulman, when a user enters a delimiter that is a commit key, the delimiter is "included as part of the programming language statement in addition to committing the menu item" (col. 9, lines 28 – 32). Hence, the insertion of the delimiter is not automatic, but in response to the user "pressing a commit key," which is the delimiter.

Applicant respectfully submits that none of the claims are disclosed or suggested by Shulman or any other art of record for at least the reasons given above. In addition, the dependent claims are allowable at least because they depend from corresponding ones of the above allowable independent claims.

Claims Rejections Under 35 U.S.C. §103

Claims 16-18 and 20 are rejected under 35 U.S.C. §103(a) as being unpatentable over Shulman in view of the design choice of programming an opening boundary token. Claim 20 is rejected under 35 U.S.C. §103(a) as being unpatentable over Shulman in view of SGML as taught by U.S. Patent No. 5,583,762 issued to Shafer (hereinafter "Shafer").

Applicant submits that the Office trivializes claims 16 – 18. The Office separates the limitation of the particular opening boundary token recited in these claims from their functionality as opening boundary tokens between two lexical contexts. The Office completely ignores the recitation of the first and second lexical contexts in all of these claims and only focuses on choice of the opening boundary token. The Office has not shown that each and every limitation of the claims is taught by the art of record.

Claims 16 – 18 and 20 are at least allowable for the reasons above. In addition, the claims are dependent upon the allowable independent claim 12.

Conclusion

In summary, claims 1 – 30 are in the case. All claims are believed to be allowable over the art of record, and a Notice of Allowance to that effect is respectfully solicited. Nonetheless, if any issues remain that could be more efficiently handled by telephone, the Examiner is requested to call the undersigned at the number listed below.

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Steven R. Gilliam — 26-Apr-2005
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Respectfully submitted,

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